

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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SCOTT TURNAGE, CORTEZ D. BROWN,  
DEONTAE TATE, JEREMY S. MELTON, ISSACCA  
POWELL, KEITH BURGESS, TRAVIS BOYD,  
TERRENCE DRAIN and KIMBERLY ALLEN  
on behalf of themselves and all similarly situated persons,

Plaintiffs,

v.

BILL OLDHAM, in his individual capacity as former  
Sheriff of Shelby County, Tennessee; FLOYD BONNER,  
JR., in his official capacity as the Sheriff of Shelby County,  
Tennessee; ROBERT MOORE, in his individual capacity  
as former Jail Director of Shelby County, Tennessee;  
KIRK FIELDS, in his official capacity as the Jail Director  
of Shelby County, Tennessee; CHARLENE MCGHEE, in  
her individual capacity as former Assistant Chief of Jail  
Security of Shelby County, Tennessee; REGINALD  
HUBBARD, in his official capacity as Assistant Chief of  
Jail Security of Shelby County, Tennessee; DEBRA  
HAMMONS, in her individual capacity as former Assistant  
Chief of Jail Programs; TIFFANY WARD in her official  
capacity as the Assistant Chief of Jail Programs of Shelby  
County, Tennessee; SHELBY COUNTY, TENNESSEE,  
a Tennessee municipality; TYLER TECHNOLOGIES,  
INC., a foreign corporation; GLOBAL TEL\*LINK  
CORPORATION, a foreign corporation; SOFTWARE  
AG USA, INC., a foreign corporation; SIERRA-CEDAR,  
INC., a foreign corporation; SIERRA SYSTEMS GROUP,  
INC., a foreign corporation, and TETRUS CORP, a foreign  
Corporation,

Defendants.

Civil Action No. 2:16-cv-02907-  
SHM-tmp

Jury Demanded

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**NOTICE TO TAKE THE DEPOSITION OF KEITH BURGESS**

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TO: **Keith Burgess**

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Pursuant to Federal Rule of Civil Procedure 30(a)(1), Defendants Shelby County, Tennessee, Bill Oldham, Robert Moore, Charlene McGhee, Debra Hammons, Floyd Bonner, Jr., Kirk Fields, Reginald Hubbard, Tiffany Ward (collectively “Shelby County Defendants”), Tyler Technologies, Inc., Global Tel\*Link Corporation, Software AG USA, Inc., Sierra-Cedar, Inc., Sierra Systems Group, Inc., and Tetras Corp. will take the deposition of **Keith Burgess via Zoom Video Conferencing on Thursday, October 1, 2020 at 10:30 a.m. (CST)** and continuing until such time as completed. A link to the video conference will be provided to participating parties via email.

The testimony shall be recorded by a certified court reporter by stenographic, video, audio, electronic and/or other means. The deposition shall be taken before a notary public or other officer authorized by law to administer oaths.

The deposition is for class certification discovery. It may be used as evidence and for all other purposes authorized by law.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that the foregoing is being filed via the Court's ECF system this 28<sup>th</sup> day of September, 2020, for service on all persons registered in connection with this case, including:

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